IN THE UNITED STATES
DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative
of

THE COMMONWEALTH OF PUERTO RICO, *et al.,*

Debtors[1]

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PROMESA
Title III

No. 17 BK 3283-LTS

Re: ECF No. 21738

(Jointly Administered)

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URGENT CONSENSUAL MOTION FOR A SECOND EXTENSION TO RESPOND TO DEBTOR'S OBJECTION TO CLAIM

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE LAURA TAYLOR SWAIN:

COMES NOW, ROCKET LEARNING LLC, through the undersigned counsel to respectfully request a second extension to file its response to the FOUR HUNDRED EIGHTY-EIGHT OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES' RETIREMENT SYSTEM OF

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[1] The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO DEFICIENT CLAIMS, filed on August 5, 2022, at ECF No. 21738.

The appearing creditor respectfully prays for an order granting the relief requested.

Background

1. The Debtor filed the Four Hundred Eighty-*Eighth Omnibus Objection (Non-Substantive) Of The Commonwealth Of Puerto Rico, The Employees' Retirement System Of The Government Of The Commonwealth Of Puerto Rico, And The Puerto Rico Public Buildings Authority To Deficient Claims* on August 5, 2022, at ECF No. 21738, "the Objection").

2. Among the claims objected is number 115471 filed by creditor Rocket Learning LLC. The claim includes supporting documents that afford the claim a prima facie validity as to the existence of the debt, the amount of the debt, and the legal basis of the claim in compliance with statutory requirements.

3. However, in the Objection, the Debtor is contesting the creditor's asserted liability and requesting additional supporting documents to validate the claim.

4. In order to pursue a consensual resolution of the Objection to claim 115471, on September 3, 2022, at ECF No. 22055, Rocket Learning LLC requested an initial 30-day extension to reply to the Objection filed at ECF No. 21738. The Court granted the extension at ECF No. 22072.

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Request for Relief

5. As anticipated in the initial motion requesting an extension and as part of pursuing a consensual resolution of the Objection to claim 115471, Rocket Learning LLC has forwarded two sources of documents to Mr. Bauer and Mr. Miranda, which were previously sent to the FOMB through DCG LLC in April 2020.

6. The FOMB or the designated entity must review the document sources before continuing good faith communications to resolve the Objection to Rocket Learning LLC's proof of claim.

7. Hence, Rocket Learning LLC requests a second thirty-day extension to file the response to the Objection to claim 115471.

8. This extension is filed with the consent of the Financial Oversight and Management Board for Puerto Rico ("the FOMB")[2]. Counsel Gabriel Miranda of O'Neill & Borges LLC has informed in writing the FOMB's consent to a thirty (30) day extension of time for Rocket Learning LLC to respond to the FOUR HUNDRED EIGHTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS (NON-SUBSTANTIVE) filed at ECF No. 21738.

9. Rocket Learning LLC respectfully requests **November 4, 2022,** as the deadline to respond to the Objection. The FOMB, through Mr. Miranda, requests **November 21, 2022,** as the deadline to reply if necessary.

10. Upon the representations made by Mr. Miranda in writing and the good faith communication between counsel for the FOMB and Rocket Learning LLC, no

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opposition to this Urgent Motion requesting a second extension is anticipated.

Therefore, the FOMB and Rocket Learning LLC agree on these deadlines:

    a. The deadline Rocket Learning LLC to respond to the Objection to claim shall be extended to **November 4, 2022**.

    b. The deadline for Movants to reply, if necessary, shall be extended to **November 21, 2022**.

    c. The Court will schedule a hearing on the Objection to claim.

WHEREFORE, Rocket Learning LLC respectfully prays for the Court to grant this Urgent Consensual Motion and enter the Proposed Order and such other relief as is just and proper.

I HEREBY CERTIFY a copy of this notice of appearance was filed with the Clerk of the Bankruptcy Court for the District of Puerto Rico using the CM/ECF system, which will serve notice and copy of this filing to all registered participants.

Notice

Notice of this Urgent Motion in compliance with the Case Management Procedures has been sent to all the standard parties as instructed therein.

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[2] The FOMB is the representative of the Commonwealth of Puerto Rico, acting as said Debtor's sole Title III representative under section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act ("PROMESA").

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RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on September 29, 2022.

Counsel for Rocket Learning LLC

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